UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

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) Case No. 3:22-CR-00282
) District Judge Eli J. Richardson
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DEFENDANT CADE COTHREN'S MOTION FOR LEAVE TO FILE UNDER SEAL AND EX PARTE

Comes now Defendant Cade Cothren, by and through undersigned counsel, and respectfully requests leave to file the following pleading under seal pursuant to Local Rule 5.03(a) and ex parte for the same reasons set forth in Mr. Cothren's Sealed Memorandum of Law in Support of Motion for Leave to File Under Seal and Ex Parte (Doc. No. 104). The following document, which Mr. Cothren is requesting leave to file under seal and ex parte, is directly related to multiple previously sealed documents. Additionally, the Court instructed Mr. Cothren to file such additional information ex parte and under seal in its April 8, 2024 Ex Parte and Sealed Order (Doc. No. 139).

From the face of the sealed document, it is clear that the interests in favor of sealing the document, including Mr. Cothren's interests in preserving the attorney-client privilege and his privacy, outweigh the legitimate interests of the public or the government in accessing the sealed document. The filing of a redacted version of this document is impractical under the circumstances of the information presented in Mr. Cothren's filing. Mr. Cothren seeks to file his pleading under seal in its totality.

WHEREFORE, PREMISES CONSIDERED, Mr. Cothren respectfully moves this Honorable Court for leave to file his pleading under seal and ex parte in its entirety.

Respectfully Submitted,

Sherwood Boutique Litigation, PLC

/s/ Cynthia A. Sherwood

Cynthia A. Sherwood, #20911 Austin M. Correll, #39561 414 Union Street Suite 1110 Nashville, TN 37219 T: 615-873-5670 F: 615-900-2312 cynthia@sherwoodlitigation.com austin@sherwoodlitigation.com Counsel for Defendant Cade Cothren

Barnes & Thornburg LLP

/s/ Joy Boyd Longnecker

Joy Boyd Longnecker, #29627 827 19th Avenue South Suite 930 Nashville, TN 37203-3447 T: 615-925-9506 Joy.Longnecker@btlaw.com Counsel for Defendant Cade Cothren

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion was electronically filed with the Clerk on July 17, 2025, and service was made upon the following via CM/ECF and/or by email.

Edward M. Yarbrough Jonathan P. Farmer Steven C. Fann Spencer Fane LLP 511 Union Street **Suite** 1000 Nashville, TN 37219

eyarbrough@spencerfane.com jfarmer@spencerfane.com cfann@spencerfane.com

John P. Taddei Blake J. Ellison U.S. Department of Justice Public Integrity Section 1301 New York Ave. NW Ste 10th Floor Washington, DC 20530 john.taddei@usdoj.gov blake.ellison@usdoj.gov

Taylor J. Phillips U.S. Attorney's Office 719 Church Street Suite 3300 Nashville, TN 37203 taylor.phillips@usdoj.gov

W. David Bridgers L. Wells Trompeter Holland & Knight LLP 511 Union Street, Suite 2700 Nashville, Tennessee 37219 david.bridgers@hklaw.com wells.trompeter@hklaw.com

Ben M. Rose RoseFirm, PLLC Post Office Box 1108 Brentwood, Tennessee 37024 ben@rosefirm.com

/s/ Cynthia A. Sherwood Cynthia A. Sherwood